

NANCY E. PRITIKIN, Bar No. 102392
RONALD D. ARENA, Bar No. 218421
LITTLER MENDELSON
A Professional Corporation
650 California Street, 20th Floor
San Francisco, CA 94108-2693
Telephone: 415.433.1940

Attorneys for Defendant
RIGHT MANAGEMENT CONSULTANTS, INC.

CHARLES M. LOUDERBACK, Bar No. 88788
PAUL D. HERBERT, Bar No. 104527
JANINE R. HUDSON, Bar No. 206671
THE LOUDERBACK LAW FIRM
One Embarcadero Center, Suite 2300
San Francisco, CA 94111
Telephone: 415.398.7860

**Attorneys for Plaintiff
MARY JEAN HONG**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MARY JEAN HONG,

Case No. C04 4011 PJH (EDL)

Plaintiff,

V.

**RIGHT MANAGEMENT
CONSULTANTS, INC., DOES 1 through
100, inclusive,**

Defendants.

DISCOVERY MATTER

STIPULATION AND [PROPOSED] ORDER RE DISCOVERY MOTION DEADLINE WITH REGARD TO PLAINTIFF'S REQUESTS FOR PRODUCTION, SET TWO

1 **WHEREAS** the parties to the above-captioned action are in the process of meeting
2 and conferring over a resolution of most or all of any remaining disputes with regard to Plaintiff's
3 Requests for Production, Set Two;

4 **WHEREAS** the parties have reached agreement on the production of several
5 categories of documents; and

6 **WHEREAS** the parties have agreed to continue diligent efforts to meet and confer on
7 all remaining issues in dispute on an expedited basis;

8 **IT IS HEREBY STIPULATED AND AGREED** by and between the Parties hereto
9 through their undersigned counsel, that Defendant's deadline for producing records in further
10 response to Plaintiff's Requests for Production, Set Two, shall be extended in accordance with the
11 agreement of the parties; and that Plaintiff's deadline for moving to compel with regard to any of the
12 documents request in its Requests for Production, Set Two, shall be extended to January 17, ~~2005~~
13 without prejudice to Plaintiff's right to bring any such a motion earlier than January 17, ~~2005~~
14 continuing meet and confer process has reached impasse. The parties agree that Plaintiff may bring
15 any such motion on shortened time.

16 **IT IS SO STIPULATED.**

17 DATED: December , 2005

18 By: _____ /s/
19 PAUL D. HERBERT
20 THE LOUDERBACK LAW FIRM
21 Attorneys for Plaintiff
22 MARY JEAN HONG

23 DATED: December 15, 2005

24 By: _____ /s/
25 RONALD D. ARENA
26 LITTLER MENDELSON, P.C.
27 A Professional Corporation
28 Attorneys for Defendant
 RIGHT MANAGEMENT
 CONSULTANTS, INC.

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1 **SO ORDERED.**

2 DATED: December 16, 2005



3 HON. ELIZABETH D. LAPORTE
4 MAGISTRATE JUDGE OF THE U.S. DISTRICT
5 COURT, NORTHERN DISTRICT OF CALIFORNIA

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